

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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18-cv-04103 (PKC)(LP)

BIANCA ABREU,

Plaintiff

-against-

AFFIRMATION IN SUPPORT OF
MOTION FOR ATTORNEY'S FEES

RECEIVABLE COLLECTION SERVICES,
LLC,

Defendant

-----x

ROBERT L. ARLEO, ESQ. P.C., an attorney duly admitted to practice law in the State of New York and in the United States District Court for the Eastern District of New York, hereby affirms the underlying to be true under the penalties of perjury:

1. My law firm represents Receivable Collection Services, LLC, the Defendant named in the above-entitled lawsuit.
2. I am fully familiar with all aspects of the herein lawsuit and I submit this Affirmation in support of the Defendant's motion to compel the Plaintiff and her attorneys to pay the attorneys fees incurred by the Defendant in defense of the herein lawsuit.
3. Attached hereto as Exhibit "1" is a copy of my letter dated July 9, 2018 addressed to attorneys Edward Geller and M. Harvey Rephen which I sent to each via email on that date.

4. After sending the referenced letter, I spoke via telephone with attorney Geller who advised me that he had received and reviewed the letter and that he would not withdraw the Queens County lawsuit referenced therein.
5. I advised attorney Geller during our telephone conversation that the refusal to withdraw the Queens County lawsuit would result in a removal of said lawsuit to this federal district court.

DATED: New York, New York
September 20, 2018

/s/ Robert L. Arleo
ROBERT L. ARLEO, ESQ. P.C.
380 Lexington Avenue,
17th Floor
New York, New York 10168
Phone: (212) 551-1115
Fax: (518) 751-1801
Email: robertarleo@gmail.com

TO: Edward B. Geller, Esq. P.C.
Of Counsel to M. HARVEY REPHEN
& ASSOCIATES, P.C.
15 Landing Way
Bronx, New York 10464